

NRDC's Interests and Position

NRDC seeks to ensure that energy policy leads to economically efficient, socially responsible, and environmentally sound outcomes. In furtherance of these objectives NRDC has, over the years, been a party in numerous contested case dockets related to renewable energy. For example, NRDC was an active participant in the Judith Gap advance approval docket (D2005.2.14) and played an important role in the Commission's decision-making with respect to that project. NRDC also was extensively involved in the drafting and the passage of Montana's renewable energy standard law.

NRDC supports the inclusion of renewable resources in a utility's portfolio for a variety of reasons including avoiding both the price risk associated with fossil fuel price volatility and the damaging health, social, and environmental effects associated with the production and use of fossil fuels. NRDC also believes that, compared to large, centralized projects, smaller-scale renewable projects have certain advantages. Thus, NRDC is concerned about excusing NorthWestern Energy from its compliance obligation.

At bottom, NRDC is interested in ensuring that Montana's renewable energy standard law is correctly interpreted and implemented so that the benefits of renewable energy flow to Montanans. At this point in the proceeding, NRDC does not take a position on the ultimate question posed by NorthWestern Energy's petition. NRDC reserves the right to develop that position informed by discovery as the proceeding evolves.

Finally, NRDC's interests are unique and cannot be adequately represented by the participation of any other party in this proceeding. NRDC will not delay the proceeding

or prejudice any party through its intervention, nor will it seek to broaden the issues presented in this docket.

Service of Documents

Movant requests that all documents in this proceeding be served on:

Charles Magraw
501 8th Ave
Helena, MT 59601
(406) 449-3375
c.magraw@bresnan.net

Conclusion

For the foregoing reasons, NRDC requests the Commission to grant this motion to intervene.

Respectfully submitted,

Charles E. Magraw
501 8th Ave.
Helena, MT 59601
(406) 449-3375
(406) 461-3696 (mobile)

Attorney for Natural Resources Defense
Council

August 12, 2011

CERTIFICATE OF SERVICE

I hereby certify that the above signatory has, this ____ day of August 2011, served the foregoing by electronic delivery and first-class mail, postage prepaid, to the applicant.